Response to Comments

Q. A question was asked about the status of construction of the treatment plant upgrade and whether limitations in the proposed permit apply to the plant existing at the time this permit was proposed (lagoon system) or to the upgraded treatment system (sequential batch reactor) which was under construction.

A. It was anticipated that the proposed permit would be issued after the treatment plant upgrade was completed and operational. Therefore the proposed permit limitations apply to the upgraded plant. A compliance schedule for upgrade construction and interim limitations were included in a Federal Facilities Compliance Agreement between the Navy and EPA. Construction of the treatment plant upgrade have since been completed. The new treatment plant is now fully operational and meeting all limitations included in the proposed permit.

Q. Has a compliance schedule for meeting proposed water quality-based chorine limitations been established?

A. No, the upgraded treatment plant provides dechlorination of the discharge and the effluent is reported to be meeting proposed chlorine limitations..

Q. A commenter pointed out that the proposed loading limitations for BOD and TSS were incorrectly based upon the peak design flow rather than the monthly average design flow of the upgraded plant.

A. The maximum monthly average design flow for the new plant is 0.85 mgd. Effluent loading limitations for BOD and TSS should be based upon this flow. Therefore, these limitations have been revised in the permit from 438 and 656 lbs/day to 213 and 319 lbs/day for monthly and weekly average, respectively.

Q. Was a screening analyses conducted to determine if there was a reasonable potential to violate state marine sediment criteria.

A. An evaluation of the outfall was conducted which included underwater observations by divers and modeling of the marine currents in the vicinity of the outfall. Repairs to the outfall were completed as a result of this evaluation. The evaluation report cited that there was no apparent deposition of sediment or observable impacts from the discharge. Strong currents and constantly shifting sands occur near the outfall. The diffuser on the outfall was determined to be blocked by moving sands in the evaluation conducted in 1993. Since that time, a two port We diffuser was installed to replace the plugged outfall. Although chemical analyses of sediment around the outfall has not been conducted, there is little likelihood that parameters addressed under Washington's marine sediment criteria are present in the wastewater treated at the Ault Field

treatment plant. These are the principle reasons it was determined that there was no reasonable potential for the discharge to violate marine sediment criteria. The permittee will be required to conduct another outfall evaluation during the term of the permit.

Q. Is sludge from the Seaplane Base, operated by Oak Harbor, to be stored in the Ault Field lagoon?

A. No. The sludges (biosolids) discussed in the fact sheet and permit are those that had collected in the Ault Field wastewater treatment lagoon and sludges that are being generated during operation of the newly upgraded treatment plant.

Q. Subsequent to publication of the draft permit, the permittee asked EPA if they might be allowed to route several low volume waste streams to the upgraded treatment plant after providing pretreatment. Some of these wastestreams are presently being handled and disposed as Washington State Dangerous Wastes. The permittee suggests that these wastestreams are eligible for exclusion from the definition of solids wastes if discharged to a federally owned treatment works. These wastestreams include:

Wastestream	**Maximum Volume per Year (gallons)**
AIMD Rinsate Sump	65,000
T-56 Engine Gas Path Cleaning	<5,000
Water Curtain Paint Booths	<4,000
Alodine Rinse Water	<3,000
NDI Penetrant Rinsate	<500

The permittee states that pretreatment regulations proposed by EPA for the Metal Products and Machinery Rule Phase I, Aircraft Sector would cover the above wastestreams were they to be discharged into the base's wastewater treatment plant. However, these regulations are projected to be a couple of years away from promulgation. The pollutants which may be present in these wastestreams include metals and solvents.

A. EPA is considering this request and consulting with the Washington Department of Ecology about applicable state dangerous waste and RCRA regulations. In addition to ascertaining compliance with these regulations, routing the wastestreams to the treatment plant will not be approved if pass-through of pollutants to receiving waters, interference with treatment plant processes, or contamination of biosolids will occur at the treatment plant. No changes to the permit are anticipated to be necessary if it is determined that these wastestreams are amenable to further treatment in the Ault Field treatment plant and the request is approved. Therefore, EPA is issuing this permit in advance of a final decision on this request.

Q. The permittee asked when, during the next five years, the required outfall evaluation should

be conducted.

A. The evaluation should be conducted during year four of the permit and the results (report) submitted with the next application for permit reissuance.

Q. The permittee asked whether the emergency use of fire fighting foam needed to be reported within 24-hours if discharged into the treatment plant collection system.

A. The answer to this question depends on the constituents of the foam and potential effects on the treatment plant and effluent quality. Therefore, situations when foam enters the collection system and treatment plant should be reported.

Q. Can wastewater be diverted from the new plant into the lagoon to protect the sequential batch reactors from being “knocked off-line” from incidences such as spills?

A. Such diversions are not a violation of the permit. However, contaminants that accumulate in the lagoon will be a factor in determining future utilization/disposal of biosolids.